

MEMO ENDORSED

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June 16, 2022

BY ECF

Honorable Valerie E. Caproni
United States District Judge
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: Weekes v. Barn & Willow, Inc.
22-cv-00992 (VEC)

Dear Judge Caproni:

This office was just retained to represent Defendant Barn & Willow, Inc. in the above referenced action. I write to request the adjournment of tomorrow's in-person conference scheduled for June 17, 2022 at 11:30 AM and to request an extension until July 18, 2022 for Defendant to respond to the complaint. I reached out to counsel for Plaintiff and outgoing counsel for Defendant and they consent to the requests.

Briefly, it is my understanding that the complaint herein was filed on or about February 3, 2022 and Defendant was served on or about February 28, 2022. On or about March 16, 2022, an appearance was filed by Krista Bolles, Esq. of Dorsey & Whitney LLP on behalf of Defendant. However, since in or about May 2022, Ms. Bolles has been attempting to withdraw as counsel. The most recent Court Memo Endorsement, dated June 4, 2022, states that a client representative of Defendant is required to appear at a conference on June 17, 2022 and, if no such representative appears, that the Court will likely grant Ms. Bolles' motion to withdraw as counsel.

Yesterday evening, my firm was formally retained to represent Defendant, so it is our position at this point that Ms. Bolles may be relieved as counsel and that the conference scheduled for tomorrow can be cancelled. In addition, the June 4, 2022 Order adjourned the Defendant's deadline to answer, move or otherwise respond to the complaint *sine die*. I have conferred with counsel for Plaintiff and they consent to an extension until July 18, 2022 to

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respond to the complaint. The extension would also serve as a window in which the parties can explore early settlement of this case, if possible.

I apologize for the short notice of this request, but my firm was only retained yesterday evening. Thank you for your courtesies.

Respectfully submitted,



Adam C. Weiss

cc: Edward Y. Kroub, Esq.
Krista Elizabeth Bolles, Esq.
client

Application GRANTED.

The hearing, currently scheduled for Friday, June 17, 2022 at 11:30 A.M., is hereby CANCELLED. The motion to withdraw, filed by Krista Bolles, is GRANTED.

The initial pre-trial conference is rescheduled for **Friday, July 22, 2022 at 10:00 A.M.** Pre-conference submissions are due no later than **Thursday, July 14, 2022.** For the courtroom information and a description of the pre-conference submissions requirements, the parties should consult the Court's order at docket entry 5.

Defendant's deadline to answer, move, or otherwise respond to the complaint is **Friday, July 22, 2022.**

The Clerk of Court is respectfully directed to close the open motions at docket entries 8 and 16.

SO ORDERED.



Date: June 16, 2022

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE